

REMARKS

This Amendment and Request for Reconsideration is submitted in response to an outstanding final Office Action dated September 10, 2004, the shortened statutory period for response set to expire on December 10, 2004.

I. **Status of the Claims**

Please amend claims 1, 5, 9, 13, 15, and 16 as indicated above. Claims 1-18 are now pending in the application. Claims 1, 5, 9, 13, and 16 are independent claims.

Applicant acknowledges the Examiner's citation of statutory authority as a basis for claim rejections.

II. **Rejections under 35 U.S.C. § 102**

The Examiner has rejected claims 1, 2, 4, 5, 7-9, 11-13, and 16 under 35 U.S.C. § 102(b) as being anticipated by Besaw (U.S. Patent No. 5,276,789). Applicant respectfully traverses the rejection.

Claim 1 as amended recites a method for graphically representing interactions between units of individual persons within an organization, which comprises: providing a graphical object corresponding to each unit of individual persons; positioning said graphical objects to correspond to the relative positions of the units of individual persons within the organizational hierarchy; varying graphical properties of said graphical objects to correspond to preselected attributes of the units of individual persons; and displaying on a display screen said graphical objects and interactions between the units of individual persons represented by said graphical objects.

Claim 5 as amended recites a method for graphically representing interactions between individual members within a unit of persons of an organization, which comprises: providing a graphical object corresponding to each individual member of the unit; positioning

said graphical objects to correspond to the relative positions of the individual members within the unit hierarchy; varying graphical properties of said graphical objects to correspond to preselected attributes of the individual members; displaying on a display screen said graphical objects and interactions between the individual members represented by said graphical objects; and displaying on said display screen other related units within the organization.

Claim 9 as amended recites a method for graphically representing interactions between an individual person and other persons within an organization, which comprises: providing graphical objects corresponding to the interacting individual persons; varying graphical properties of said graphical objects to correspond to preselected attributes of the individual persons; displaying on a display screen said graphical objects; and displaying on said display screen direct interactions between the individual persons and indirect interactions between the individual persons to a preselected depth level.

Claim 13 as amended recites a method for graphically representing interactions between hypothetical units of individual persons within an organization, which comprises: forming the hypothetical units of individual persons based on analysis of interaction data between members of actual units within the organization; providing a graphical object corresponding to each hypothetical unit of individual persons; varying graphical properties of said graphical objects to correspond to preselected attributes of the hypothetical units of individual persons; and displaying on a display screen said graphical objects and interactions between the hypothetical units of individual persons represented by said graphical objects.

Claim 16 as amended recites a method for graphically representing interactions between individual members of units of persons within an organization, which comprises: providing graphical objects corresponding to the individual members; positioning said graphical objects such that the individual members of each unit are clustered together; varying graphical

properties of said graphical objects based on connectivity and diversity measures of the corresponding individual members; and displaying on a display screen said graphical objects.

Applicant respectfully disagrees with the Examiner's premise, at page 7 of the Office Action, that "Besaw clearly teaches the graphical representation of interactions between individual units (i.e. units of individuals) within an organization." The independent claims at the time of the latest office action specifically recited a method for graphically representing interactions between units of individuals within an organization, individual members an unit of an organization, an individual member and other members within an organization, or hypothetical units of individuals within an organization. By reading these claims in full, it is clear that: 1) contrary to what the Examiner stated, the "individual units" of Besaw which the Examiner referred to are not the same as the "units of individuals" (or "individual members") recited in the claims; and 2) there are no "interactions" as recited in Applicant' claims in Besaw's invention.

Regarding the first point, it must be noted that Besaw merely discloses the graphical representation of a network of computers, and what the Examiner referred to as the individual units of Besaw are computers in a network. A network of computers, however, is not an organization with individuals or units of individuals. Even if each computer in Besaw is actually operated by an individual--which is not necessarily the case--that still would not convert Besaw's computers into an individual person or a group of individuals. Thus Besaw does not disclose "an organization" as recited in the claims, and Besaw's individual computers cannot be equated with units of individuals within an organization, individual members an unit of an organization, an individual member and other members within an organization, or hypothetical units of individuals within an organization.

Furthermore, regarding the second point, Besaw does not disclose any graphical representation of interaction among its computers. The graphical representation disclosed in the portions of Besaw cited by the Examiner, including Figs. 2-5, provide no information regarding what kind of interaction the displayed computers have with each other if any. For instance, Besaw's system does not "vary[] graphical properties of ... graphical objects to correspond to preselected attributes" of units of individual persons, individual members, individual persons, or hypothetical units of individual persons as recited in the independent claims. Rather, Besaw merely discloses graphical representation of a computer network that shows which network computers are connected or linked to which other network computers (i.e., topology). *See* Besaw at col. 2, ll. 51-65. In other words, Besaw only discloses the graphical representation of the physical or spatial relationship of computers, which is a far cry from a graphical representation of the dynamic, interactive relationships among units of individual persons within an organization (or among individual members within an unit of persons of an organization, individual persons within an organization, or hypothetical units of individual persons within an organization).

Accordingly, for at least these reasons, Besaw does not disclose or suggest all of the features of the independent claims. Accordingly, Applicant requests that the anticipation rejection be withdrawn.

III. Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 3, 6, 10, 14, 15, 17, and 18 under 35 U.S.C. § 103 as being unpatentable over Besaw in view of Bereiter (U.S. Patent No. 5,909,217). Applicant respectfully traverses the rejection.

For the reasons stated above, Besaw does not disclose all of the features of independent claims 1, 5, 9, 13, or 16. As with Besaw, Bereiter merely discloses maps of computer network nodes, and does not disclose graphical representation of interactions between

individuals or units of individual persons within an organization. In addition, rejected claims 3, 6, 10, 14, 15, 17 and 18, depend from independent claims 1, 5, 9, 13, or 16, and include the limitations of the independent claims. Accordingly the combination of Besaw and Bereiter does not disclose all of the features of dependent claims 3, 6, 10, 14, 15, 17 and 18, and Applicant requests that the rejection as to this basis be withdrawn as well.

IV. Request for Approval to Amend Drawings

In the attached Request for Approval to Amend Drawings under Rule 121(d), Applicant has amended Figure 1 by changing the label above the words "DATA COLLECTION" from "140" to "100".

V. Request for Reconsideration

Applicant respectfully submits that the claims of this application are in condition for allowance. Accordingly, reconsideration of the rejection and allowance is requested. If a conference would assist in placing this application in better condition for allowance, the undersigned would appreciate a telephone call at the number indicated.

Respectfully submitted,
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